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17. (New) An apparatus comprising:

a device for controlling the playback of media;

a remote control with a single integrated, complete set of user interface control elements, wherein the remote control is removably attached to the device.

18. (New) An apparatus comprising:

a device with controls;

a remote control with a single integrated, complete set of user interface control elements, wherein the remote control is removably attached to the device.

REMARKS

Reconsideration of this application, as amended, is respectfully requested. Claims 1-16 are pending in the application. Claims 1-7 and 9-12 have been amended. Claims 13-18 have been added without introducing any new matter. No claims have been canceled.

Applicants have amended the claims to more particularly and more clearly point out what Applicants regard as their invention. Support for the amendments and the new claims is found in the specification, the drawings, and in the claims as originally filed. The claims were not amended for matters of patentability.

Objections

The Examiner objected to claims 4 and 9 as containing informalities. Applicants have corrected the informalities and respectfully request the withdrawal of the objection. Applicants further respectfully submit that no new issues are raised by the corrections.

Rejections Under 35 U.S.C. §102(b)

Claims 7 and 8 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,450,487 of Koide (hereinafter "Koide"). Applicants respectfully disagree with the rejections because Koide does not disclose each and every element of the invention as claimed in claim 7.

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Koide discloses a system in which a remote control may be used to operate a video tape recorder (VTR) while the remote control is attached to a video camera. The video camera is attached to the VTR via a cable. When the VTR remote control is attached to the camera, the remote sends VTR control signals to the camera using metal connectors. The camera then relays the remote control signals to the VTR via the camera's existing cable connection to the VTR (col. 6, line 48 to col. 7, line 24).

Claim 7 as amended teaches that a remote controller can be physically attached to the device that it controls, "a housing; [¶] the housing shaped to allow for docking within a cavity in an electronic entertainment device and flush with a surface of the electronic entertainment device."

Applicants respectfully submit Koide does not disclose a system in which a remote control can be physically connected to the device that it controls. Instead, Koide describes a system that utilizes an existing cable connection between a video camera and a VTR to transmit remote control signals to the VTR (Koide, Figures 1 and 2). Because the remote control controls the VTR and not the Camera, the remote control disclosed in Koide is not capable of being docked within a cavity of the device that it controls, as taught in claim 7 as amended.

Accordingly, Applicants respectfully submit that Koide does not anticipate claim 7 as amended for at least the reason discussed above. Applicants respectfully request the Examiner to withdraw the rejections.

Claim 8 depends directly on claim 7. Since Koide does not anticipate claim 7 as discussed above, claim 8 is not anticipated by Koide for at least the same reasons.

Furthermore, Koide does not anticipate newly added claim 15. Claim 15 teaches that the remote control of claims 7 and 8 has "control buttons [that] correspond to functions of the electronic entertainment device that are triggered exclusively by the control buttons on the remote controller." Thus, as claimed in claim 15, the remote control has the exclusive means to trigger certain functions of the electronic entertainment device. The remote control described in Koide, however, provides a completely redundant set of controls to those already present on the VTR, "the buttons 8a through 8i attached to the manipulation portion 3 of the remote-control unit 8 have the same functions as the above-mentioned buttons 3a through 3i of the VTR 1" (Koide, column 4, lines 47-50; Figure 1). Therefore, since Koide discloses a remote control that contains buttons that are not the exclusive means to trigger functions on the VTR, Koide fails to

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disclose each and every limitation of new claim 15. Therefore, Applicants respectfully submit that Koide does not anticipate claim 15 under 35 U.S.C. §102(b) for at least the reason discussed above.

Since Koide does not anticipate claims 7, 8, and 15 under 35 U.S.C. §102(b) as discussed above, Applicants respectfully request withdrawal of the rejections.

Rejections Under 35 U.S.C. §103(a)

Claims 1-6 and 9-12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Koide, in view of U.S. Patent No. 5,486,852 (hereinafter "Arai"). Applicants respectfully traverse the rejections for the following reasons.

Koide describes a system where a remote control can be connected to a video camera. When attached to the video camera, the remote control can send signals to a VTR through an existing cable connection between the VTR and video camera. The Examiner admitted, however, that Koide fails to disclose the use of two infrared (IR) transmitters within a remote control, as well as an "IR transmitter [that] transmits signals to a light pipe embedded within the entertainment device ..." (Office Action, page 4, paragraph 3).

For two references to render an invention obvious under 35 U.S.C. § 103(a), the references must, alone or in combination, disclose or suggest every element of the invention [MPEP 706.02(j)]. The Examiner argued that Arai discloses the use of an infrared transmitter that alternatively transmits signals to a light pipe when the remote control is coupled with the entertainment device (Office Action, page 4, paragraph 3). Applicants respectfully disagree with the Examiner, for at least the reasons discussed below.

Arai fails to describe the use of "a first and second infrared transmitter" where "the first infrared transmitter ... transmit[s] signals to the electronic entertainment device while the housing is docked within the cavity of the electronic entertainment device" and the other transmitter transmits "while the housing is not docked within the cavity of the electronic entertainment device," as claimed in claim 1 as amended. Instead, Arai describes a system with a single infrared transmitter that transmits to alternative infrared receivers (Arai, figure 7, units 48 and 22). Therefore, similar to Koide, Arai also fails to disclose the use of "a first and second infrared transmitter" embedded within a remote control.

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The Examiner also argued that Arai describes a remote control that transmits signals to a light pipe while attached to the video camera (Office Action, page 4, paragraph 3). However, Arai describes a remote control that transmits to a light-receiving unit:

The camera body 40 has the infrared light receiving unit 48 disposed in a place where the remote-control unit 41 is to be mounted. The infrared light receiving unit 48 is thus arranged to be capable of receiving the infrared rays (light) from an infrared ray emitting diode window 26 which is disposed on the side of the remote control unit 41.

(Arai, col. 5, lines 14-19).

Specifically, the infrared transmitter beams light signals directly into an optical receiver (Arai, Figure 7, units 26 and 48). Arai also discloses that the same infrared transmitter is used to transmit signals to the camera when the remote control is not attached to the camera (Arai, Figure 7, units 22 and 26).

In Claim 1 as amended, the Applicants describe a system with two IR transmitters where "the first infrared transmitter [is] positioned in the housing and aligned in the cavity to enable the first infrared transmitter to transmit signals to a *light pipe* embedded within the electronic entertainment device" (emphasis added). A light pipe is comparable to a fiber optic cable, which allows light signals to be non-linearly transmitted within the light pipe with little or no loss in the integrity of the signal. An IR receiver, however, can only receive a signal that is directly beamed into it. Since a "light pipe" is not the same as an infrared receiver and Arai only describes the use of a light receiving unit, Arai fails to describe each and every element of the Applicants' invention as claimed in claim 1 as amended.

Thus, neither Arai nor Koide, taken alone or in combination, describe or suggest transmitting an infrared signal into a light pipe that is embedded in an electronic entertainment device, as recited in claim 1 as amended. Furthermore neither Arai nor Koide, taken alone or in combination, describe or suggest using two infrared transmitters where one infrared transmitter is used to transmit signals while docked with the entertainment device and the other transmitter is used to transmit signals to the electronic entertainment device when not docked within the device.

Moreover, there is no motivation to combine these references because they are directed towards different areas not related to the Applicants' invention. Koide discloses a system in which a VTR remote control is attached to a video camera in order to provide a convenient placement for the remote control while the video camera is being operated and to prevent a wired

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remote control and wired video camera from becoming entangled during operation. Arai discloses a video recording system where a VTR and video camera are integrated into the same unit and a remote control may be mounted on the video camera to operate either the video camera or the VTR. Arai addresses the problem of user confusion as to which mode, VTR or video recorder, the user is currently using. The presently claimed invention, however, addresses the problem of eliminating redundant controls on a generic electronic entertainment device that can be controlled by a remote control. The Applicants solved the problem of redundant controls by shaping a remote control "to allow for docking within a cavity in an electronic entertainment device and flush with a surface of the electronic entertainment device." When the remote control is docked within the cavity and flush with a surface of the electronic entertainment device, it provides the controls that are traditionally disposed on an electronic entertainment device. However, because the remote control contains the control buttons and the necessary functionality to generate control signals, the redundant controls can be removed from the electronic entertainment device. Thus, one skilled in the art would not look to combine Koide and Arai to solve the problem of reducing redundant controls by using a remote control with two infrared transmitters which alternatively transmit signals to an entertainment device depending on whether or note the remote is coupled with the electronic entertainment device.

Therefore, Applicants respectfully submit that claim 1 is not obvious under 35 U.S.C. §103(a) over Koide in view of Arai.

Independent claims 4 and 9 contain the same language as claim 1. Therefore, Applicants respectfully submit that for at least the same reasons advanced above, claims 4 and 9 are not obvious under 35 U.S.C. §103(a) over Koide in view of Arai.

Claims 2 and 3 depend on claim 1 and include features that further limit claim 1. Claim 5 and 6 depend on claim 4 and further limit claim 4. Claims 10-12 depend on claim 9 and include features that further limit claim 9. Therefore, Applicant respectfully submits that for at least the same reason advanced above with respect to independent claims 1, 4, and 9, claims 2, 3, 5, 6, and 10-12 are not obvious under 35 U.S.C. §103(a) over Koide in view of Arai.

New Claims

New dependent claims 13, 14, 15, and 16 depend on correspondent independent claims 1, 4, 7, and 9 and include features that further limit claims 1, 4, 7, and 9. Applicants respectfully

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submit that claims 13-16 are allowable for at least the reasons set forth above with respect to claims 1, 4, 7, and 9. Allowance of claims 13-16 is earnestly solicited.

With respect to Claims 17 and 18, neither of these references provides the means for controlling all functions of the device. Arai shows that there are controls on the camera as well as controls on the removable remote control. The present invention as claimed in claims 17 and 18 provides a low cost design with great flexibility for the end user to use the controls either on the device or off.

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SUMMARY

Claims 1-16 are currently pending. In view of the foregoing amendments and remarks, Applicants respectfully submit that the pending claims are in condition for allowance, and such action is earnestly solicited. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

Please charge any shortages and credit any overcharges to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Dated: <u>9\w</u>, 2004

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12400 Wilshire Boulevard Seventh Floor Los Angeles, CA 90025-1026 (408) 720-8598 I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 20, 2004.